

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

Shawnda Y. Martin King

FEB 21 2024 PM2:11
FILED - USDC - NDTX - LU

PA

Plaintiff

5 - 24 C V - 058 - H

v.

Civil Action No.

Lubbock ISD, Lubbock ISD - Superintendent Rollo, Kathy, K., Lubbock ISD – Human Resources Executive Director: Flores, Maximilian, Lubbock ISD Board of Trustee- Former President: Zach Brady, Lubbock ISD – Chief Operations Officer: Rodriguez, Rick

Defendants

Complaint

Title VII of the Civil Rights Act of 1964 (Title VII), which makes it illegal to discriminate against a person on the basis of race, color, religion, sex (including pregnancy, sexual orientation, and gender identity), or national origin.

Institutional discrimination is the treatment of an individual or group of individuals by society or institutions, through unequal consideration of members of subordinate groups. These unfair and indirect methods of discrimination are often embedded in an institution's policies, procedures, laws, and objectives. The discrimination can be on grounds of gender, caste, race, ethnicity, religion, or socio-economic status.

Section 1981 §1981 (Section 1981) creates a federal cause of action for individuals claiming **intentional** racial discrimination. To support such a claim, a plaintiff must allege that he is a member of a racial minority, and that he was discriminated against within a particular group of activities set forth in the statute.

Equal Pay Act of 1963 The EPA, which is part of the Fair Labor Standards Act of 1938, as amended (FLSA), and which is administered and enforced by the EEOC, prohibits sex-based wage discrimination between men and women in the same establishment who perform jobs that require substantially equal skill, effort and responsibility under similar working conditions. EPA prohibits discrimination on account of sex in the payment of wages by employers engaged in commerce or in the production of goods for commerce.

Workplace Harassment A person commits an offense if, with intent to harass, annoy, alarm, abuse, torment, or embarrass another, the person:

Workplace Retaliation A person commits an offense if the person intentionally or knowingly harms or threatens to harm another by an unlawful act.

Legal Malpractice: Misrepresentation/Deception Trade Practice Act

Emotional Distress: FMLA, deformation of character, depression, anxiety, and insomnia

Lubbock ISD EMPLOYEE SERVICE CENTER

Degrees: Texas Tech University, Lubbock, Texas

- Bachelors, Early Childhood – Dec. 1998
- Masters, Educational Leadership – May 2013

Certifications: PK- 6: Elementary/Early Childhood (**reminders are emailed prior to lapse**)

KICKUP: T-TESS evaluations, T-PSS evaluations, Professional development

Administrators Courses: CPR, CPI, AEL, T-PSS, -Reminders are emailed from HR

Resume: Career Positions, Teacher certifications, Skillsets, Responsibilities

Service Records: January 1999 - today

Lubbock ISD selected the following candidates for an Interview for

Principal Position at Talkington SWYL

1. **Aretha Cortez (Black)** ~ 2+ years of teaching, 5 years Associate Principal at Talkington, Masters, Ed Leadership, Principal Certification
2. **Catherine Van Hoorebeke (white)**~ 2+ years of teaching, College Advisor at Talkington, Academic Dean at Talkington, Masters, Ed Leadership
3. **Shawnda King (black)** ~ 18 years of teaching, 2 years as an Instructional Coach, 5 years as an Assistant Principal, Master Ed Leadership
4. **I requested Open Records on February 6, 2024. Lubbock ISD Executive Director of Communication, Erin Gregg stated Texas Public Information Acts grants 10 days for processing open records. She stated, Lubbock ISD has up to February 20, 2024. Today, I went to pick up the open record request. No documents were given.**

Aug. 01, 2016	I returned to Lubbock ISD as an Instructional Coach at Maedgen Elementary School. Principal: Drue Coleman / Assistant Principal, Alma Cunningtubby
Sept. 28, 2017- April 2018	I was inducted and completed the Lubbock ISD Aspiring Administrators Cohort: This is a preparatory course created by Lubbock ISD to prepare aspiring administrators within the district.
Feb. 1, 2017	Valerie Holloway (HR) emailed: Educator Certification reminder~ Your standard certificate/teaching credential(s) will expire on 02/28/2017.
Feb. 26, 2018	Lubbock ISD Aspiring Administrators - AP Screening Interview: Sent by Naomi Caughron Lubbock ISD HR) Shawnda King's Resume is attached listing my certification. The Interview was March 9, 2018.
May 2018	Spring of 2018, Mrs. Drue Coleman asked me to be her Assistant Principal. I told her I did not have my principal certificate. She asked me if I had my masters in Ed. Leadership and I replied, yes; I graduated from TTU with my master's in educational leadership in May 2013. She said, that's all you need. She said, "Shawnda, there are plenty of assistant principal and principals in the district

	without their principal certification. If they want you, they want you!" She instructed me to go online and fill out the application. I followed her instructions and applied for the position. In June, Rick Rodriguez, Lubbock ISD's Human Resource Executive Director called me, congratulated me, and explained my new title/salary promotion. He said, next you will have to take some courses at Region 17 to become certified in T-TESS and AEL before the new school year begins. He said there will be other professional developments I will also have to take as the assistant principal, and my assistant will contact you and arrange your registration.
July 12, 2018	Transfer Notification: Sent by Olivia Garcia, Cynthia Pena, Shay Jennings
July 12, 2018	T-TESS & AEL at Region 17: Noemi Caughron (renew every 2 years)
I was an outstanding Lubbock ISD Assistant Principal for 5 consecutive years.	
July 2018 – June 2019 1 Year of 1	Assistant Principal at Maedgen Elementary: My responsibilities were Campus Testing Coordinator, STAAR Administrator, T-TESS Administrator, TELPAS Administrator, Safety & Security Administrator, Review 360 - Discipline, Title 1, (PLC's) Professional Learning Communities, SST's, 504's, and ARD's. Principal: Drue Coleman (Black)/ Executive Principal: Damon McCall (white)
July 2019 – June 2022 3 Years of 4	Assistant Principal at Alderson Elementary: My responsibilities were: Campus Testing Coordinator, STAAR Administrator, T-TESS Administrator, TELPAS, Safety & Security, Review 360 - Discipline, (PLC's) Professional Learning Communities, SST's, 504's, and ARD's. Principal: Dr. Drue Coleman/ Executive Principal: Dr. Cicely Alexandar (LPN-Black)
July 2022- June 2023 1 Year of 5	Assistant Principal at Irons Middle School: My responsibilities were: T-TESS Administrator, Review 360 - Discipline, SST's, 504's, ARD's. Principal: Dr. Tommy Duncan (white) / Executive Principal: Damon McCall
April 11, 2023	During morning duty, Dr. Duncan told me that there were several open principal positions available in the district (Honey and Williams ES) and that I should apply for the positions. He said I was ready to be a principal. That same day, I applied for Honey and Williams ES.
April 12, 2023	During morning duty, Dr. Duncan asked me if I had applied for any of the principal positions and I replied, yes. I told him that I applied for Honey and Williams ES. Dr. Duncan then said that there's another principal position coming, and I would be the perfect person. I asked him if the position was elementary, he replied, no; but that it was a blue-ribbon school. I told him if it was middle school or high school, I was not interested, He repeatedly stated I would be perfect person and that Lubbock ISD wanted someone who reflected the demographics of the students at Talkington SYWL.
April 2023	Executive Principal Damon McCall visited briefly with me at Irons MS. Damons said I would be the perfect principal for Talkington. He said, Talkington needs a person that reflected the minority, single-gendered campus. He gave me a few documents about Talkington's history.
April 19, 2023	Today, I attended Assistant Principal professional development at Atkins MS. Damon McCall called me, he stated his boss, Superintendent - Dr. Kathy Rollo told him to tell me to apply for the Talkington principal position and whatever his boss tells him to do, he does it. He sternly stated, "Shawnda, go and apply

	<p>for the Talkington principal position!" I immediately went back into the meeting, logged into the online employee portal, and applied for Talkington principal position.</p> <p>That same day, I interviewed for the Williams Elementary principal position. I was not aware the Executive Principal, Damon McCall's wife; Suzanne McCall was also interviewing for the same position.</p>
April 20, 2023	<p>Dr. Rollo's secretary called me and scheduled me to interview with Dr. Kathy Rollo about Williams ES principal position. She said I was in the top two for the position for Williams and that Dr. Rollo would make the final decision of who would be the principal of Williams after the interview.</p> <p>At 2:00 pm, Damon McCall stopped by my office and interviewed with me about Talkington principal position.</p>
April 21, 2023	<p>At 3:30 pm, My interview with Superintendent – Dr. Kathy Rollo concerning the Williams ES principal position. Initially, Dr. Rollo questioned and complimented me about the Williams interview, and then she said, "let's put a pin in Williams, what do you think about Talkington?" I expressed my hesitations (lack of HS experience) and then she affirmed me. She said, "You are a first-generation graduate. You've been the teacher of the year in Lubbock ISD and Florida; not to mention an outstanding Instructional Coach. Plus, you've been an Assistant Principal for five years working with diverse campuses and populations." "Shawnda, you are the perfect person for the Talkington position. I will not name the principal for Williams until you have the opportunity to interview for the Talkington principal position."</p>
April 24, 2023	<p>Executive Principal Amy Stephens texted me and arranged for us to meet at her office to discuss Talkington.</p>
April 26, 2024	<p>I went to Lubbock ISD central office and Amy Stephens interviewed me.</p>
April 28, 2023	<p>2:30 pm, I arrived at Lubbock ISD central office, and I interviewed for Talkington SYWL Principal: Presentation, Q&A</p>
May 2, 2023	<p>I have not received a call from Dr. Rollo's secretary concerning the top two potential candidates for Talkington SYWL principal position.</p>
May 3, 2023	<p>Young Women Preparatory Network Conference cancelled by Max Flores.</p>
May 8, 2023	<p>Young Women's Preparatory Network Conference: Bertha Ferguson, Kitty Harris, Kara Swindell, Tarah Williams, +2 more.</p>
May 10, 2023	<p>Lubbock ISD's Superintendent – Dr. Kathy Rollo called and left me a voicemail. She said, "Shawnda, tomorrow is going to be a whirlwind of a day and I just want to let you know, I'm glad you said yes." "I look forward to working with you next year at Talkington."</p>
May 11, 2023	<p>My family, friends and I arrive at Lubbock ISD at 7:00 am. The Board of Trustees voted and named me as the new principal of Talkington SYWL. Suzanne McCall was named as the principal for Williams ES.</p>
May 15, 2023	<p>My first Talkington staff meeting. Bertha Fogerson requested a short biography, my resume, and a picture.</p>
May 19, 2023	<p>I participated in Talkington End of the Year; Talent Show and I toured the campus.</p>
May 19 – 23, 2023	<p>I interviewed each staff member to learn their ambitions, concerns, and hobbies.</p>

May 29, 2023 Bertha Ferguson (white) second principal of Talkington (YWPN Consultant). She requested a one-to-one meeting with me. We met at Talkington on Memorial Day. I really didn't want to meet, but she made me feel like the meeting was urgent. She requested that I bring my resume. Bertha said, when she was ready to retire from Lubbock ISD picked Julie Wyatt (white) as her successor, and she didn't know why Julie did not pick and prepare a successor before she retired.

May 30, 2023 **Behavior Solution Leadership Professional Development: Lubbock ISD Leadership Team per campus**
I sat with my Talkington leadership team: AP's, academic dean, counselors, and lead teachers. Max Flores approached my table and asked to speak with me. I responded, give me a few minutes please. I walked over to Max, he was standing with Damon McCall (EP) and Misty Reiber (Chief Academic Officer, she sat on my interview panel for Talkington, and she was also a part of my Aspiring Admin. – AP Screening Interview Committee). Max stated in front of Damon and Misty, Shawnda, I've looked everywhere, and I can't find your principal certification. Did you get your principal certification in Florida? Someone called this weekend and said, Shawnda doesn't have her principal certification... Max, Damon, and Misty looked at me and waited on my response. I paused and asked him if I could speak to him privately. He said yes and I returned to my table. The three stood there and continued laughing and talking.

About thirty minutes later, I texted Max and asked if we could talk privately. We met in the back of the cafeteria, and I explained I did not have my principal certification. I told him in 2018, Dr. Drue Coleman asked me to be her assistant principal and I told her I did not have my principal certification and she said if I had my masters in Ed Leadership, that's all I needed. She continued and said, there are plenty of people in the district without their principal certification. If they want you, they want you. Max replied, "Shawnda, you need your principal certification by July." I asked him if he could help me get it and he said yes; he told me the quickest way to try and get it was to try Florida. I immediately went back into professional development, got my keys, went to my car, and googled how to sign up for the Florida Educators Leadership Exam. I registered for the exam and took a screenshot of my registration and texted it to Max.

May 31, 2023 **Talkington Leadership: Marzano Training with Proficiency Scales**

Sec. 21.053. DISCRIMINATION BY LABOR ORGANIZATION. A labor organization commits an unlawful employment practice if because of race, color, disability, religion, sex, national origin, or age the labor organization:

- (1) excludes or expels from membership or discriminates in any other manner against an individual; or
- (2) limits, segregates, or classifies a member or an applicant for membership or classifies or fails or refuses to refer for employment an individual in a manner that would:
 - (A) deprive or tend to deprive an individual of any employment opportunity;
 - (B) limit an employment opportunity or adversely affect in any other manner the status of an employee or of an applicant for employment; or
 - (C) cause or attempt to cause an employer to violate this subchapter.

Lubbock ISD Superintendent Dr. Kathy Rollo and executives intentionally sabotaged my educational career and all I did was follow their directives. It should have been second nature for HR & Dr. Rollo to apply for a waiver through TEA on June 1, 2023. After all, my degrees and certifications are within Lubbock ISD's Frontline and Employee Service Center online portal. TASB outlines options for certifying and uncertified assistant principal. The options are an interim, a probationary principal certificate or the district could have applied for a waiver of principal certificate. Applying for the waiver through TEA would not guarantee my acceptance, but it would have validated Lubbock ISD's aggressive intent of me being recruited versus' the districts collected efforts of conspiring me through the application process only to terminate my employment. Dr. Rollo refused to apply for the waiver. Lubbock ISD alleged to wanting a minority for the blue-ribbon, single gender magnet school for public support, only to achieve two things in a single action, by hiring the least qualified minority to avoid hiring the most qualified minority. The vested associate principal was already employed at Talkington, with one graduate of TSYWL, one sophomore, and a soon-to-be sixth grader. As Bertha said, Mrs. Cortez is the indispensable backbone of the school. She reflects the schools' demographics. She has high-achieving daughters, and the community loves her! But somehow, she wasn't selected as one of the top two candidates to interview with Dr. Rollo for the principal position and neither was I. Unlike the process for the Williams ES principal position with the top two candidates. That part of the interview process was disregarded. Lubbock ISD's tradition continues for Talkington, the blue-ribbon, single-gendered magnet school: only hiring white females as principals. This is Institutional and Intentional Racial Discrimination.

While simultaneously, Matt Chancy(white/male) an additional noncertified principal within Lubbock ISD continues in his assistant principal position until after my third (final) grievance hearing (January 25, 2024). The week of January 29, 2024, Lubbock ISD altered the school - Priority Intervention Academy website administrator's page and his email. They removed Matt Chancy as the administrator and placed him as an Inclusion Teacher. Open records will reveal administrators' certificates T-TESS, AEL, CPR, CPI, and that he attended administrators' professional development assigned to principals, assistant principals, or associate principals exclusively.

June 1, 2023	Max Flores, Lubbock ISD Executive Director called and requested that I report to his office. Upon arrival, Max immediately said, unfortunately Shawnda, your time is up, and you need to resign. I was shocked by his words, so I restated them, resign, why would I resign? He said, "they" don't think you'll have your principal certification in time. I reminded him that he told me on Tuesday that I had until July and that I had a meeting scheduled with TTU concerning my principal certification. I also reminded him that I had already paid for the Florida (FELE) exam and that I was scheduled to take it at the end of June. I begged and pleaded for more time. I told him I would not resign because I had not done anything wrong. He responded, 'if I don't resign, you will be terminated!' I was confused, enraged, and disoriented. I said, why would I be terminated, he said because you don't have your principal certification. I told him the district knew; I didn't have my principal certification; it's in the employee service portal and it's also in Frontline. I firmly stated, Lubbock ISD principals and assistant principals only need their masters in Ed. Leadership! I reminded him of what Dr. Coleman told me years ago. He yelled, "Shawnda you should have known this was coming!" You need to resign; I told him no; I didn't know this was coming and that there were others without their principal certification! I asked him why did they asked me to apply. Damon, Amy, and Kathy TOLD ME to apply! I followed their directives! I didn't set up the interview and I didn't hire myself! You did, you hired me as the principal of Talkington! I told Max, I didn't know
--------------	---

who the other principals or assistant principals are that don't have their principal certification, I've never checked, you need to check. Max said, are no other principals or assistant principals without their principal certification, he already checked! He stated all Lubbock ISD principals and assistant principals have their certification; "YOU" are the only one without your principal certification. (Tort of Deceit and Gender/Racial Discrimination– **Matt Chancy – does not have his principal certification**). He said just resign or you will be terminated! I told Max, you've only given me two days to get it. He said an email will go out to parents tonight informing them that you will not be the principal of Talkington. I begged him to see the email and he said, no – just resign! He told me I was not allowed to return to Talkington or any other Lubbock ISD campus.

I went home devastated, broken, and confused. Why would they push me to apply, only to hire me? I called him an hour later hoping to fix the problem with time to take the test. I asked if I could work at central office or in a different position. He responded no, the district was cutting back on positions and that I needed to resign. He said, you can be a teacher. I responded, can Lubbock ISD give me the same courtesy that was given to my co-worker assistant principal, Tom Thomas? Mr. Thomas was the principal at Bean Elementary in 2021. He was demoted to assistant principal and Lubbock ISD allowed him to keep his principal salary while working as an assistant principal. At first Max Flores denied the allegation, and then, he said, we fixed that (**EPA**). He sternly stated, if you are a teacher, you will only receive teachers' pay! When Tom Thomas (2021 – 2023) was paid as a principal, he was doing the job of an assistant principal. Why was he privileged with a higher salary? EPA prohibits discrimination on account of sex in the payment of wages by employers engaged in commerce or in the production of goods for commerce.

That evening, I received a **Notice of Suspension: Workplace Retaliation**

The notice of suspension detailed if I resigned by Monday, June 5th no further actions would be taken against me, but if I did not, on June 15th Lubbock ISD would motion to the Board of Trustees that my contract be void and that I be terminated immediately. The notice prohibited me from talking to coworkers, teachers, or no family member students. I was prohibited to go on all any Lubbock ISD campuses without permission, I was removed from all Lubbock ISD email list, and I was instructed to return all Lubbock ISD equipment and property.

June 2, 2023	I met Max Flores at Talkington SYWL. I returned my laptop, my badge, and Talkington t-shirts. I removed all my personal belongings for Talkington campus.
June 6, 2023	Retaliation/Deformation of Character Max Flores and Superintendent – Dr. Kathy Rollo emailed Talkington parents informing them that I would not be the principal as previously stated and that Lubbock ISD would find someone that was highly qualified to fill the position. Dr. Rollo states that Julie Wyatt (retiring principal) will remain at Talkington as the Interim Principal until a new principal is found.

June 15,
2023

Lubbock ISD Board of Trustees Meeting:

My family and community spoke on my behalf during public comments: Samuel King, Sr., Samuel Jr., Sharniece, and Phyllis Gant. I also spoke and explained my journey within Lubbock.

During closed session, Board of Trustees president, Zach Brady along with Superintendent Dr. Kathy Rollo requested to speak with my husband and I alone.

Legal Malpractice: Negligent/ Deception Trade Practice Act- Zach Brady Retaliation/ Workplace Harassment – Dr. Kathy Rollo

My husband and I were not aware that Mr. Brady was an attorney. Lubbock ISD Superintendent Dr. Rollo should never have allowed him to conduct a meeting without me having an attorney present. He is not the contracted attorney for Lubbock ISD. Zach Brady spoke for the BOT without duly reaching a unified consensus from the board before speaking for the board. Due to his legal advantage, he was able to manipulate our judgement, perception, and livelihood. The contract we signed should be void.

Zach Brady said, “I am one thousand percent sure how this could end, Shawnda. You are here to be terminated because you do not have your principal certificate and your contract to be void. But I think I have an idea. You see sometimes the Board of Trustees must make tough decisions, that we hate to make, but we have to, and if we voted today, it wouldn’t end in your favor. But I think I have an idea. Now with the Talkington principal position, we just can’t get that genie back in the bottle, but if you resign today, I think we can make sure that you still have a job (Dr. Rollo sat quietly). All the other principals and assistant principals in Lubbock ISD have their principal certification, but you do not.

We are going to allow you to take the Texas Principal Exam as soon as possible, and if you pass it, you’ll get to be an administrator somewhere in the district. That will be totally up to Dr. Rollo. However, if you do not pass the test, you’ll have to take a teacher’s job with teachers’ pay. How soon do you think you can take it? I told Mr. Brady currently I’m scheduled to take the Florida exam at the end of this month. He said the Florida exam won’t help you. He said, you must take and pass the Texas exam as soon as possible. I told him there’s a hold on my TEA file prohibiting me from taking the 268 Principal as the Instructional Leader. He said he would make sure the hold was removed and that I need to find the soonest date in July. While sitting at the conference table, I called Dr. Selenda Cumby from TTU and she helped me find a testing date in Lubbock, July 25, 2023. At this point, I was crying and shaking. Mr. Brady peered at me and my husband from across the table and said, “Now, you must make this decision today!” Dr. Rollo and I will step out of the room to give you and your husband a moment to talk.

This was the most traumatic day of my life; my career, my responsibilities, my character, and my reputation all flooded my mind and I sat shattered with the two options of demise. Mr. Brady and Dr. Rollo returned and left immediately upon hearing my despairing cry. When they returned with the papers in hand and the gruff reminder that this offer was only for today and he already knew the verdict if the board had to vote. I gathered myself and regrettably signed the documents.

June 15, 2023	Erin Gregg (Lubbock ISD executive director) called me after we left the meeting. She explained that the local news had the recording from today and she asked if I had spoken to them about my employment with the district. I told her no, and she said she would handle the rest.
June 1-Aug. 30th	Lubbock ISD District Initiated Admin Leave Lubbock ISD allowed Matt Chancy to continue in his AP position with his principal certification.
June 6, 2023	Grievance Level I filed.
June 25, 2023	Florida Educators Leadership Exam: Oklahoma City, Oklahoma
June 28, 2023 – February 2024	TTUHSC – Counseling with Mandy Fair
June 26, 2023	Grievance Level I Lubbock ISD Administrator: William Smith Appeal Denied July 27, 2023
June 25, 2023	Mental Breakdown: Anxiety, Insomnia. Depression, Grief Dr. Hima Ravi
July 26, 2023	TEXES: Principal as Instructional Leader: Exam Date Results: Did Not Pass
Aug. 24, 2023	Grievance Level II Lubbock ISD Administrator: Ken Salazar Appeal Denied – September 7, 2023.
Aug. 25, 2023	For pay period start date: 06-26-2023 – 7-31-2023. My pay classification was already changed to: Teacher. Exam 268: I took the <u>Principal as Instructional Leader</u> exam on July 25, 2023. The results were not posted until 08/18/2023.
Aug, 30, 2023	Breach of Contract/ Workplace Harassment/Racial/Gender Discrimination <ul style="list-style-type: none"> Unlawfully Reassign from an Assistant Principal to an Interventionist (21.206A, B) & Board Policy – Lacked proper termination. Unacceptable working conditions Placed at a bilingual school. Half of the students speak Spanish and I do not speak, nor do I understand the Spanish language. Lubbock ISD Human Resource Director: William Smith He called and sent an email: New Contract effective Sept. 1, 2023 You do not have a principal certification; therefore, you cannot be an administrator. Adjusted position and pay: Bean ES: Interventionist/ Days: 167/Salary: \$54,744.27 (327.81. per day) First day: September 5, 2023
Aug. 30, 2023	EEOC Inquiry of Discrimination and Retaliation TSTA Matthew Bickley- (614) 314-9133 referred me to an attorney. Attorney Randall Duke (214)282-6370 (214)720-2240. Randall Duke initially supported my claims, but after I returned from FMLA, he had changed. He

	wanted me to be okay with being a teacher and he stated repeatedly, he would not represent me for the discrimination/retaliation charge. Randal Duke did cover the combined grievances III & I.
Sept. 5 – 15, 2023	Bean Elementary School: Interventionist – ESSER Funds (Ends May 2023-2024)
Sept. 18, 2023	Principal as Instructional Leader (268) Score Review: No change
Sept. 15, 2023	Workplace Harassment FMLA paperwork denied: Laura Soto
Sept. 19, 2023	Grievance Level 1 /III submitted to Lubbock ISD Notice of Appeal to the Board Attorney Randall Duke
Sept. 18 – Dec. 15, 2023	FMLA paperwork received from Laura Soto with instructions. She stated as of Dec. 19, 2023, I will have exhausted your 60- day FMLA entitlement.
Sept. 29, 2023	<p>Workplace Retaliation</p> <p>From Ann Manning (white), Lubbock ISD's attorney to my attorney Randall Duke.</p> <p>Thank you for your response Randall. As you are aware, Ms. King has been placed on FMLA at her request. So that there will be no interference with her taking her FMLA, the board will hear her combined grievances when she has completed her FMLA and will be placed on the January 29, 2024 agenda. Unfortunately, due to the Open Meetings Act regulations, you would not be permitted to attend by zoom. I will get you the details of that meeting when they are completed. Please place this on your calendar. I look forward to working with you. If I am unavailable in my office, you are welcome to contact me on my cell phone 806-773-3853.</p>
Oct. 2023	Lubbock ISD Board of Trustee President, Zach Brady (White) steps down as president and becomes a trustee.
Oct 27, 2023	Teacher's salary
Nov. 9, 2023	Lubbock ISD Board of Trustee, Pastor Bill Stubblefield (Black) was elected president of the Board. He did not follow the DGBA (Local) Personnel Management Relations Employee Complaint/Grievances. Exhibit Q page 6/7. Level Three
Nov. 27, 2023	Teacher's salary
Dec. 12, 2023	FMLA prescription: return to work – December 22, 2023 Denied Laura Soto

Dec. 2024	FMLA Lubbock ISD paperwork emailed to Laura Soto. FMLA return to work documents were not uploaded to the portal by Laura Soto. I uploaded my return-to-work documents.
Dec. 20, 2023	FMLA Infringement/Workplace harassment Vaun Murphy (White) Vaun emailed me and said either my check would be too small to cover my deductions or I wouldn't have a check at all. I requested to see my check stub and she responded she's not a member of payroll. She stated Lisa Thompson would contact me by the end of the day. Lisa never called or emailed me.
Dec. 21, 2023	I emailed my Principal Letty Gutierrez and informed her I would return to work tomorrow. Mrs. Gutierrez said she had not heard from HR concerning my return. I told her I would contact them again and cc her. Workplace Harassment Will Smith (HR director) called and asked when I planned on returning to work. I told him tomorrow, Dec. 22, 2023. He said you do not have to return tomorrow; we have you scheduled to return on January 8, 2023. I told him my FMLA papers said I could return on Dec. 22nd. He asked why do you want to return? I said I want to get paid for the holidays and I know I must be at work the day before and the day after the holiday. He said, "I'm unsure if that's correct." I became upset, and asked him why he called me, if he is unable to answer my questions? He continued to badger me about not returning to work on Friday, December 22, 2023, and I told him I cannot see my check stub and if he could speak to someone about my pay? Later that day, Will and Lisa Thompson included me on an email thread about a teacher's contracted days, holidays, and average salary; but the email never answered my direct question, and no one responded to me about my check stub until January 18th. I did not receive a paycheck on Dec. 22, 2023.
Dec. 22, 2023	I did not return to work as originally planned. Workplace retaliation No paycheck and no check stub. Lisa Thompson never responded to email.
Dec. 14, 2023	School Board Synopsis ~ Lauren Smith Talkington SYWL Interim Principal Julie Wyatt (white) Retires from Lubbock ISD and becomes Talkington's Consultant. The newest Assistant Principal, Dr. Tiffany Longoria (white) became interim principal of Talkington SYWL. Associate Principal Aretha Cortez (Black) - Institutional Discrimination
Jan. 8, 2024	First day back at Bean ES. Lubbock ISD Elementary, Middle, High Schools, and Other Schools Directory: <ul style="list-style-type: none"> Talkington SYWL – Dr. Tiffany Longoria is labeled as the principal and the executive principal is Dr. Damon McCall.